

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

JOE NATHAN MICHAEL

CRIMINAL COMPLAINT

Case Number:

10-MJ-213 (JJG)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 27, 2010, in Anoka County, in the State and District of Minnesota, defendant(s)


did by force, violence and intimidation, take from the person or presence of another approximately \$1991.00 in United States currency belonging to and in the care, custody, management and possession of the TCF Bank, located at 250 57th Avenue NE, Fridley, Minnesota, who deposits were then insured by the Federal Deposit Insurance Corporation ,

in violation of Title 18, United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant
Thomas A. Perzichilli
FBI

Sworn to before me, and subscribed in my presence,

5/28/10

Date


The Honorable Jeanne J. Graham
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

at

St. Paul, MN

City and State


Signature of Judicial Officer**SCANNED**

MAY 28 2010

U.S. DISTRICT COURT ST. PAUL

10-MJ-213 (JJG)

STATE OF MINNESOTA)
) s.s. AFFIDAVIT OF THOMAS A. PERZICHILLI
COUNTY OF RAMSEY)

Thomas A. Perzichilli, being duly sworn, deposes and says:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Minneapolis Division. I have been so employed as a Special Agent for 6 years.

2. I am assigned to investigate violent crimes, including bank robberies.

3. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and upon my review of official reports submitted in relation to this investigation. Further, this affidavit contains information to support probable cause but is not intended to convey facts of the entire investigation.

4. TCF Bank maintains a branch inside the Cub Foods at 250 57th Avenue NE, Fridley, Minnesota. On May 27, 2010, a lone male, later identified as JOE NATHAN MICHAEL, entered this TCF Bank branch and robbed it via demand note. The demand note, although somewhat illegible, said "Give money, I Gun". MICHAEL gave the victim teller the demand note. The victim teller told MICHAEL she did not understand what he wanted. MICHAEL told the victim teller to give him all the money and not to push any buttons. The victim teller's cash drawer was locked and she began to fidget with the keys. MICHAEL told the victim teller again not to push any buttons. MICHAEL put his left hand into his jacket pocket and pushed

something out from inside the fabric that appeared to emulate a gun. MICHAEL told the victim teller, "Do you want me to shoot you?". The victim teller told MICHAEL "No". The victim teller was able to open her drawer and get to the cash. The victim teller gave MICHAEL money, bait bills and a GPS pack from her cash drawer. MICHAEL asked the victim teller for a bag but she did not have a bag. MICHAEL grabbed the money and pushed it inside his jacket and fled the bank on foot.

5. A audit conducted by the bank revealed that the MICHAEL got away with \$1991.00.

6. Following the robbery, uniformed Fridley Police officers were dispatched to the scene. While enroute, the officers were provided a suspect description. Approximately one block from the TCF bank, officers saw an individual standing near the bus stop at 57th and University Avenue who appeared to match the description of the bank robber. They converged on the individual and ordered him to take his hands out of his pockets and get on the ground. The subject did not comply. The officers took the subject to the ground and after a brief struggle, were able to place handcuffs on him. A weapon searched revealed a large amount of cash in the subjects possession. The subject was identified as JOE NATHAN MICHAEL. The money recovered from MICHAEL's person contained recorded bait bills as well as recorded bills from the GPS pack. The recovered bait bills and GPS pack were just taken during the robbery of the victim TCF Bank.


6. The victim teller was brought to the scene by Law Enforcement officers for the purposes of a show-up. The victim teller identified MICHAEL as the individual who had just robbed her at the TCF Bank, 250 57th Avenue NE, Fridley, Minnesota.

7. The TCF Bank Branch located at 250 57th Avenue NE, Fridley, Minnesota, has a video surveillance system. The surveillance video was obtained by law enforcement. The images obtained from the bank surveillance video depicted the robber at the teller counter. The clothing worn by the robber matched that of the clothing worn by MICHAEL when he was apprehended by the Fridley Police.

8. At the time of the robbery, the deposits of the TCF Bank were insured by the Federal Deposit Insurance Corporation (FDIC).

9. Based upon these facts conveyed in this Affidavit, your affiant believes that there is probable cause that JOE NATHAN MICHAEL committed the bank robbery that occurred on May 27, 2010, at the TCF Bank, located at 250 57th Avenue NE, Fridley, Minnesota, in violation of 18 U.S.C. 2113(a).

Further affiant sayeth not.


Thomas A. Perzichilli
Special Agent
Federal Bureau of Investigation

Sworn to before me

this 28th day of May, 2010


The Honorable Jeanne J. Graham
United States Magistrate Judge